

PRIVACY NOTICE

according to the EU General Data Protection Regulation GDPR, Art. 13 and 14

This notice concerns:

The collection and use of personal data, including photos and videos, for communication purposes involving participants in the RDI project "Model for integration of foreign students through language immersion studies and work-life collaboration" (further "MISAS project"), as well as for the development and evaluation of the project activities.

Personal data controller

Novia University of Applied Sciences
Wolffintie 31
65200 Vaasa
Finland
www.novia.fi

Novia University of Applied Sciences is controller for the personal data collected and processed in the Novia UAS activities – in teaching, guidance, research and development, administration, and cooperation, internally and externally.

Responsible unit for the processing that is described in this notice:

Novia Business RDI

Contact person:

Pia Jünger, Project Manager
pia.junger@novia.fi

Data Protection Officer at Novia University of Applied Sciences:

dataskyddsbud@novia.fi, +358 6 328 5000 (switchboard)

For what purpose do we process your personal data?

Novia University of Applied Sciences acts as the main implementer in the MISAS project with Arcada University of Applied Sciences as co-implementer. The aim is to strengthen the integration in Swedish and develop a functioning model to facilitate the integration of our international students during their studies. Novia and Arcada are developing various forms of language support, language activities and language courses for students in English-taught degree programmes. Both parties plan their own measures, but the model for integration through studies is developed jointly.

Novia's project activities will include various types of possibilities for the students to immerse themselves in the Swedish language, including through work-life collaboration.

Selected international students will be appointed social media ambassadors and these will share their language journey to inspire others to learn and practice Swedish.

To encourage and support working life, the project will pilot a short training course (*språkombudsutbildning*) that provides tools for workplaces wishing to strengthen their communication, well-being and inclusion.

Part of the project activities relates to the collection and use of personal data, including photos and videos, for communication purposes involving participants in the MISAS project. Those who consent for the project to process personal data such as photos and videos related to these project activities agree to being displayed on social media platforms such as Instagram and LinkedIn, or other channels for communication purposes.

Storing photos, videos and other recordings considered to be of general interest for the memory and history of the project will be saved indefinitely (Finnish Data Protection Act 4 § 4p & The Finnish Constitution 20 §).

Personal data can also be processed for journalistic purposes. When the purpose is journalistic, Novias does not have an obligation to inform the data subjects about the processing of personal data through a privacy notice (Finnish Data Protection Act 27 §).

To be able to develop the project activities during the project lifecycle and to evaluate whether the project reaches its goals, project participants will be asked for feedback. This will be done in a survey format.

According to GDPR there must be a legal basis for processing personal data. The legal bases for processing your personal data are:

Consent (Art. 6.1 a)

You are consulted and answer yes (by written or oral statement) to that your personal data is processed for a specific purpose. You give your consent freely after getting information about how your personal data is processed (i.e., collected, stored, shared, archived, etc.). When consent is the only legal basis for processing your personal data, you have the right to withdraw at any time. You can notify that you have regretted your consent by sending an e-mail to registrator@novia.fi. The processing completed before you withdrew consent is not affected.

Justification: Agreeing to appear in photos and videos for communicative purposes is completely voluntary. If Novia finds a potential employer for the project activity "Work & Study", the student's personal data such as name, email address and phone number will be shared with that party, provided that the student has consented to this.

Therefore, Consent is chosen as legal basis.

Public interest or official authority (Art. 6.1 e)

Novia University of Applied Sciences has statutory tasks of public interest and the right to exercise official authority according to the Universities of Applied Sciences Act. Scientific research is an example of a statutory task of public interest.

Justification: To fulfil the project funders' expectations and requirements, Novia University of Applied Sciences needs to be able to gather information for the development and evaluation of the project activities.

Public interest

Justification: Regarding the storage of certain photos or videos, public interest is used as the legal basis, for the memory and history of society and the project.

Which personal data do we process, and who processes the data?

The personal data that will be processed includes, but is not limited to, names, photos, video recordings, and other identifiable information during the project and its activities.

Only those MISAS project team members at Novia who need to process the personal data will have access it.

As for the surveys, the personal data that will be processed are email addresses of survey recipients. This information has been extracted from Novia's study register as well as directly from other types of project stakeholders.

The consolidated information from the responses to the survey questions may identify a certain individual. The only people having access to the survey results are Novia's MISAS project team members and the Research Manager at the Faculty (due to decision making regarding protection of the data).

The results will only be presented in statistical form and/or as citations that do not include personal data (anonymous data). If there is a need to present citations from identified respondents, their consent will be asked separately.

Where do we collect your personal data from and how do we process the data?

The personal data will be collected by means of an O365 Forms survey. The personal data will be processed using O365 Excel.

Photos, videos and other recordings are processed and stored in O365. You can withdraw your consent at any time and request that your data is deleted. However, personal data, including photos and videos, that have already been published before you withdrew your consent, cannot be deleted.

Storing personal data, photos, videos and other recordings considered to be of general interest for the memory and history of the project will be saved indefinitely.

Since the project is co-funded by the EU through the European Social Fund, the funders' instructions regarding the registration of project participants in the EURA2021 system apply.

Is your personal data transferred (outside Novia University of Applied Sciences) for processing?

Yes, personal data will be transferred for processing outside Novia University of Applied Sciences. Personal data will be transferred for processing outside Novia when using O365 Forms survey and O365 Excel.

Personal data is also transferred for processing when photographs and videos are published on social media platforms and possibly other online channels.

Is your personal data transferred to a third party (outside Novia University of Applied Sciences) for that party's purposes?

Yes, personal data will be transferred outside Novia University of Applied Sciences. If Novia finds a potential employer for the project activity "Work & Study", the student's personal data such as name, email address and phone number will be shared with that party, provided that the student has consented to this.

Is your personal data transferred outside EU/EEA?

Yes, personal data may be transferred temporarily outside EU/EEA due to the tool being used. As with all information stored in O365, the data might be stored in the US.

Which rights do you have when Novia University of Applied Sciences processes your personal data?

Novia University of Applied Sciences is responsible for taking appropriate technical and organisational measures to protect personal data against unauthorized or illegal processing and against damage to or loss of personal data. Personal data must always be processed in a fair and transparent manner in accordance with applicable data protection regulations.

According to the EU General Data Protection Regulation GDPR (Art. 12-22), you have the right to

- get transparent information on how your personal data is processed and how you can exercise your rights (Art. 12)

-
- get access to your personal data at Novia University of Applied Sciences and information on the processing of data (Art. 15)
 - have your personal data corrected (Art. 16). Note that employees and students at Novia University of Applied Sciences can in most cases correct their own data according to the instructions on the intranet.
 - have your data erased ("the right to be forgotten") in certain situations (Art. 17)
 - restrict the processing of your personal data in certain situations (Art. 18)
 - have your personal data transferred between systems in certain situations (Art. 20)
 - object to the processing of your personal data in certain situations (Art. 21)
 - not be subject to automated decision-making, with certain exceptions (Art. 22)

Also, you have the right to be informed of a personal data breach involving a high risk to your personal data (Art. 34).

When the purpose of the processing is scientific research, statistics or archival purposes, the rights may be restricted by the Data Protection Act (1050/2018). Restrictions on rights always require special safeguard measures.

If you have questions about your rights, you can contact the responsible contact person (see above) or the Data Protection Officer (dataskyddsbud@novia.fi) at Novia University of Applied Sciences. See also the overall information on the processing of personal data on the Novia UAS website (<https://www.novia.fi/en/about-us/leading-documents/data-protection/>).

You have the right to lodge a complaint with the data protection authority if you believe that the processing of your personal data is an infringement of the General Data Protection Regulation (GDPR).

Contact information to the data protection authority
Office of the Data Protection Ombudsman
PL 800
00531 Helsinki
+358 29 566 6700 (switchboard)
tietosuoja@om.fi
tietosuoja.fi
